UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

GENESIS MARINE, LLC	§ §	Cause No. 4:21-cv-00289
	§	
v.	§ §	
SGR ENERGY, INC.	§	

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

NOW INTO COURT, through undersigned counsel, comes Genesis Marine, LLC ("Genesis") and Defendant SGR Energy, Inc. ("SGR"), and respectfully move the Court to enter the attached consent judgment. The entry of the consent judgment is a term of the settlement between Genesis and SGR, who has consented to this motion and to the form and substance of the consent judgment.

WHEREFORE, Genesis and SGR respectfully request that this Honorable Court enter the attached consent judgment acknowledging that SGR is indebted to Genesis in the amount of \$2,461,996.03, plus all reasonable past, present, and future attorneys' fees associated with the collection of same, plus 5% interest from March 16, 2021 until the entry of the consent judgment and judicial interest from the date of judgment until paid, subject to a credit for any amounts paid under the settlement between Genesis and SGR.

Respectfully submitted,

PHELPS DUNBAR LLP

BY: /s/ Arthur R. Kraatz

Evans Martin McLeod, Fed ID 411950 Canal Place | 365 Canal Street, Suite 2000 New Orleans, Louisiana 70130

Telephone: 504 566 1311 Facsimile: 504 568 9130

- 1 -

Email: marty.mcleod@phelps.com

ATTORNEY-IN-CHARGE FOR GENESIS MARINE, LLC

OF COUNSEL:

PHELPS DUNBAR, LLP

Justin C. Warner, Fed. ID 3326606 Arthur R. Kraatz, Fed. ID 2895505 365 Canal Street, Suite 2000 New Orleans, LA 70130 Telephone: (504) 56601311

Facsimile: (504) 568-9130 Email: justin.warner@phelps.com arthur.kraatz@phelps.com

AND

MUNSCH HARDT KOPF & HARR, PC

By: /s/ D. Mitchell McFarland

D. Mitchell McFarland

State Bar No. 13597700 Federal ID No. 2379

J. Mark Deaton

State Bar No. 24069588 Federal ID No. 1094927 Houston, Texas 77002

Telephone: (713) 222-1470 Facsimile: (713) 222-1475

Email: mmcfarland@munsch.com Email: mdeaton@munsch.com

ATTORNEYS FOR SGR ENERGY, INC.